

Presentment Date and Time: November 25, 2014 at 12:00 p.m. (Prevailing Eastern Time)
Objection Deadline: November 25, 2014 at 11:30 a.m. (Prevailing Eastern Time)

KLESTADT & WINTERS, LLP

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Attorney of Record for Reliance Management (Gibraltar) Limited

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Debtor.

Adv. Pro. No. 08-1789 (BRL)

SIPA LIQUIDATION

(Substantively Consolidated)

IRVING H. PICARD, Trustee for the Liquidation
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

Adv. Pro. No. 10-05311 (BRL)

UBS AG, UBS (LUXEMBOURG) S.A., UBS
FUND SERVICES (LUXEMBOURG) S.A., UBS
THIRD PARTY MANAGEMENT COMPANY
S.A., M&B CAPITAL ADVISERS SOCIEDAD
DE VALORES, S.A., M&B CAPITAL
ADVISERS HOLDING, S.A., M&B CAPITAL
ADVISERS GESTIÓN SGIIC, S.A., JB CAPITAL
MARKETS SOCIEDAD DE VALORES, S.A.
(F/K/A M&B CAPITAL MARKETS SOCIEDAD
DE VALORES, S.A.), FRANCISCO JAVIER
BOTIN-SANZ de SAUTUOLA O'SHEA,
GUILLERMO MORENES MARIATEGUI,
RELIANCE INTERNATIONAL RESEARCH
LLC, RELIANCE MANAGEMENT
(GIBRALTAR) LIMITED, LUXEMBOURG
INVESTMENT FUND AND LUXEMBOURG
INVESTMENT FUND U.S. EQUITY PLUS, as

represented by their Liquidators MAITRE ALAIN RUKAVINA and PAUL LAPLUME, MAITRE ALAIN RUKAVINA and PAUL LAPLUME, in their capacities as liquidators and representatives of LUXEMBOURG INVESTMENT FUND AND LUXEMBOURG INVESTMENT FUND U.S. EQUITY PLUS, and LANDMARK INVESTMENT FUND IRELAND,

Defendants.

**NOTICE OF PRESENTMENT OF PROPOSED ORDER GRANTING APPLICATION
OF KLESTADT & WINTERS, LLP TO WITHDRAW
AS COUNSEL OF RECORD TO DEFENDANT RELIANCE
MANAGEMENT (GIBRALTAR) LIMITED PURSUANT
TO LOCAL BANKRUPTCY RULE 2090-1(e)**

PLEASE TAKE NOTICE that upon the application of Klestadt & Winters, LLP for entry of an order authorizing it to withdraw as counsel of record to defendant Reliance Management (Gibraltar) Limited, the undersigned will present the attached proposed order to the Honorable Stuart M. Bernstein, United States Bankruptcy Judge, for signature on **November 25, 2014 at 12:00 noon (ET)**.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the proposed order must be made in writing and received in the Bankruptcy Judge's chambers and by the undersigned not later than **11:30 a.m. on November 25, 2014**. The ECF docket number to which the filing relates shall be included in the upper right hand corner of the caption of all objections. Unless objections are received by that time, the order may be signed.

Dated: New York, New York
November 10, 2014

KLESTADT & WINTERS, LLP

By: /s/ Tracy L. Klestadt
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*Attorney of Record for Reliance Management
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